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TO: Internal File

FROM: Karl R. Houskeeper, Reclamation Specialist II, Team Lead *Sm for KPH*

Re: Approval of Refuse Pile Use as Waste Fuel Resources by Sunnyside Cogeneration Facility, Plateau Mining Corporation, Star Point Mine, C/007/006-AM01C-1

SUMMARY:

On August 8, 2001, the Division reviewed AM01C submitted by Plateau Mining Corporation (PMC) relative to the Star Point Mine. On September 5, 2001, the Division reviewed AM01C-1 submitted by Plateau Mining Corporation (PMC) in response to the deficiencies of AM01C. Page 500-12 has been modified to indicate that Plateau Mining Corporation (PMC) and Sunnyside Cogeneration Associates (SCA) will maintain tonnage records for the amount of refuse removed from the (PMC) Star Point Mine to (SCA).

PMC's current MRP allows for the removal, processing, and transporting of the refuse material.

The amendment addresses Refuse Pile Use as Waste Fuel Resources by Sunnyside Cogeneration Facility. Sunnyside Cogeneration Associates (SCA) evaluated the waste as a fuel resource and asked PMC to amend its MRP to allow the refuse material to be moved to SCA's permitted facility.

TECHNICAL ANALYSIS:

OPERATION PLAN

SPOIL AND WASTE MATERIALS

Regulatory Reference: 30 CFR Sec. 701.5, 784.19, 784.25, 817.71, 817.72, 817.73, 817.74, 817.81, 817.83, 817.84, 817.87, 817.89; R645-100-200, -301-210, -301-211, -301-212, -301-412, -301-512, -301-513, -301-514, -301-521, -301-526, -301-528, -301-535, -301-536, -301-542, -301-553, -301-745, -301-746, -301-747.

TECHNICAL MEMO

Analysis:

Refuse piles

Pages 500-10 through 500-13 and 500-52 through 500-55 have been submitted for change to the MRP.

Pages 500-10, 500-13, 500-53 and 500-54 have been included because the pages in the permit are doubled sided. No change to the aforementioned pages has been made.

Page 500-11 is a clean copy that clarifies the type of equipment to be used.

Page 500-12 is a clean copy that states that tonnage records of refuse removed will be maintained by SCA and PMC. This page was modified from a deficiency noted in AM01C.

Page 500-52 is a clean copy that removed information from the MRP on reprocessing the refuse pile by PMC.

Page 500-55 is a clean copy that defines the refuse pile as waste fuel instead of coal.

Findings:

The information is clear and concise clarifying the equipment used and the use of the refuse material as a fuel source by SCA. Page 500-12 has been modified to indicate that the tonnage records of refuse removed should be kept on file by SCA and PMC.

The deficiencies listed in the previously submitted amendment AM01C have been met and are contained in this amendment AM01C-1.

RECOMMENDATIONS:

AM01C-1 addresses the deficiencies listed in AM01C and the requirements of R645-301-528.322. The submitted pages address these concerns in Plateau Mining Corporation's MRP. It is recommended that AM01C-1 be approved.